

UNITED STATE OF AMERICA
NATIONAL LABOR RELATIONS BOARD
Region 2

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| 9 TH AVENUE HOTEL PROPERTY | : | | |
| HOLDING D/B/A CASSA HOTEL TIME | : | | |
| SQUARE, VIP CONCIERGE, INC. AND | : | | |
| A&R BUILDING SOLUTIONS, INC. AS | : | | |
| JOINT EMPLOYERS | : | | |
| | : | | |
| Respondent, | : | | |
| | : | Case Nos. | 02-CA-201747 |
| And | : | | 02-CA-201748 |
| | : | | |
| NEW YORK HOTEL AND MOTEL | : | | |
| TRADES COUNCIL, AFL-CIO | : | | |
| | : | | |
| Charging Party | : | | |
| | : | | |
| LOCAL 713 INTERNATIONAL | : | | |
| BROTHERHOOD OF TRADE UNIONS | : | | |
| (9 TH AVENUE HOTEL PROPERTY | : | | |
| HOLDING D/B/A CASSA HOTEL TIMES | : | | |
| SQUARE, VIP CONCIERGE, INC. AND | : | | |
| A&R BUILDING SOLUTION, INC., | : | | |
| AS JOINT EMPLOYERS | : | | |
| | : | | |
| Respondent | : | | |
| | : | | |
| And | : | Case No. | 02-CB-201749 |
| | : | | |
| NEW YORK HOTEL AND MOTEL | : | | |
| TRADES COUNCIL, AFL-CIO | : | | |
| | : | | |
| Charging Party | : | | |

RESPONDENT’S MOTION FOR POSTPONEMENT

9th Avenue Hotel Property Holding d/b/a Cassa Hotel Times Square (“Cassa Hotel”) move the Regional Director to postpone the hearing in this matter currently scheduled for April 3, 2018 and consecutive days as needed. In support of its request, Cassa Hotel, states as follows, namely:

1. The client representatives and contacts for Cassa Hotel are of the Jewish faith and devout and observant in the faith's practices and edicts.
2. Passover is one of the most widely observed of all holidays on the Jewish calendar.
3. Passover begins on March 30, 2018 and continues through April 7, 2018.
4. The client representatives and contacts for Cassa Hotel will not be available during the Passover observance.
5. Cassa Hotel seeks a new start date of April 12, 2018.
6. The General Counsel's position is that the hearing in the matter should start at the earliest practicable date and has suggested April 9, 2018.
7. April 9, 2018 would allow no business days between the end of the holiday observance and commencement of hearing, precluding Cassa Hotel from having pre-hearing preparation time for its witnesses.
8. Respondent VIP Concierge, Inc. and A&R Building Solutions, Inc.'s position is similar to Cassa Hotel's, also due to religious observance of its leadership and potential witnesses.
9. Respondent Union Local 713 does not oppose postponement.
10. Charging Party Union Local 6 opposes any postponement.
11. The undersigned is not seeking excessive delay.
12. The undersigned does not seek delay for an unreasonable cause.
13. Any delay is not intended to be prejudicial.
14. All parties have been served with this motion.

WHEREFORE, 9th Avenue Hotel Property Holding d/b/a Cassa Hotel Times Square pray the Regional Director postpone the hearing currently scheduled for April 3, 2018, in New York, NY reschedule the hearing for a start date of April 12, 2018 or later; and such other relief as the Regional Director finds appropriate.

Respectfully submitted:

/s/ Jeffrey D. Pollack
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*Representatives for 9th Avenue Hotel Property
Holding d/b/a Cassa Hotel Times Square*

CERTIFICATE OF SERVICE

This is to certify that service of the above and foregoing RESPONDENT'S MOTION FOR POSTPONEMENT has been made on Region 2 of the National Labor Relations Board on January 29, 2018 via the Agency's e-filing portal, and courtesy copies have been electronically served on the following parties, namely:

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